

UNITED STATES DISTRICT COURT

for the

Southern District of Illinois

18-524-SMY

John D. Haywood B44617

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Plaintiff/Petitioner(s)

v.

Illinois Department of Corrections
DirectorWarden Henry of Lawrence C.C.
Warden Butler of Menard C.C.

Defendant/Respondent(s)

Case Number:

18-3003

(Clerk's Office will provide)

☒ CIVIL RIGHTS COMPLAINT

pursuant to 42 U.S.C. §1983 (State Prisoner)

☐ CIVIL RIGHTS COMPLAINT

pursuant to 28 U.S.C. §1331 (Federal Prisoner)

☐ CIVIL COMPLAINT

pursuant to the Federal Tort Claims Act,

28 U.S.C. §§1346, 2671-2680, or other law

FILED

I. JURISDICTION

JAN 03 2018

Plaintiff:

CLERK OF THE COURT
U.S. DISTRICT COURT

CENTRAL DISTRICT OF ILLINOIS

A. Plaintiff's mailing address, register number, and present place of confinement.

Lawrence Correctional Center
10930 Lawrence Rd. • Summer, IL 62466
John D. Haywood B44617

Defendant #1:

B. Defendant Dir. is employed as

(a) (Name of First Defendant)

Director Illinois Department of Corrections

(b) (Position/Title)

with Illinois Department of Corrections

(c) (Employer's Name and Address)

1301 Concordia Court • Springfield, IL 62794-9275At the time the claim(s) alleged this complaint arose, was Defendant #1
employed by the state, local, or federal government? ☒ Yes ☒ NoIf your answer is YES, briefly explain: for a part of the complaint
March 2016 Till Present Day!

Defendant #2:

C. Defendant Warden Kimberly Butten is employed as

(Name of Second Defendant)

Warden of Meverel C.C.

(Position/Title)

with Illinois Dept. of Corr.

(Employer's Name and Address)

1301 Concordia Court, Springfield, IL 62794-9277

At the time the claim(s) alleged in this complaint arose, was Defendant #2 employed by the state, local, or federal government? ☒ Yes ☒ No

If you answer is YES, briefly explain: for pent's the assault is 2014
By % Mauve (yes) But not for the entire 9 years of
Violations!

Additional Defendant(s) (if any):

D. Using the outline set forth above, identify any additional Defendant(s).

Dr. Linderman at Meverel C.C. (I.D.O.C. - Wexford)
Warden Condors of Meverel C.C. (I.D.O.C.)
Warden Gates of Meverel C.C. (I.D.O.C.)
Dr. Sheirer of Meverel C.C. (I.D.O.C. - Wexford)
% Mauve of Meverel C.C. (I.D.O.C.)
% Chandler Estate of Meverel C.C. (I.D.O.C.)
Serg. Wells of Meverel C.C. (I.D.O.C.)
Lt. Baylor of Lawrence C.C. (I.D.O.C.)
Warden Lamb of Lawrence C.C. (I.D.O.C.)
% Tubbs of Lawrence C.C. (I.D.O.C.)
% Adams of Lawrence C.C. (I.D.O.C.)
(Rev. 7/2010) Warden Goings of Lawrence C.C. (I.D.O.C.)
Mrs. Cunningham of Lawrence C.C. (I.D.O.C. - Wexford)
% Predi of Meverel C.C. (I.D.O.C.)
Dr. Sheel Lawrence C.C. (Wexford)
Nurse Collins Lawrence C.C. (Wexford)

Nurse Tammy Lawrence L.C. (Wentworth)
 Robinson Medical and Warden Deborah C.E.
 Big Muddy C.E. Medical and Administrator Sherri Harrest

II. PREVIOUS LAWSUITS

- A. Have you begun any other lawsuits in state or federal court relating to your imprisonment? ☒ Yes ☐ No
- B. If your answer to "A" is YES, describe each lawsuit in the space below. If there is more than one lawsuit, you must describe the additional lawsuits on another sheet of paper using the same outline. Failure to comply with this provision may result in summary denial of your complaint.

1. Parties to previous lawsuits:

Defendant(s): Champaign County Illinois; States Attorney Julie Ritz
 Sheriff Dep. Curt Anderson, Dep. Sherwood

Petitioner - ~~Defendant~~(s): Sch. D. Heywood Pro Se 344619

2. Court (if federal court, name of the district; if state court, name of the county): Sixth Circuit Court of Champaign County Ill.
3. Docket number:
4. Name of Judge to whom case was assigned:
5. Type of case (for example: Was it a habeas corpus or civil rights action?): Wrongful Death and Wrongful Imprisonment
6. Disposition of case (for example: Was the case dismissed? Was it appealed? Is it still pending?): Not Still Pending!
7. Approximate date of filing lawsuit: (6-2012)
8. Approximate date of disposition: (12-2014)

III. GRIEVANCE PROCEDURE

- A. Is there a prisoner grievance procedure in the institution? ☒ Yes ☐ No
- B. Did you present the facts relating to your complaint in the prisoner grievance procedure? ☒ Yes ☐ No
- C. If your answer is YES,
1. What steps did you take? *Grievance to Counselor; To grievance officer to A.R.B.*
 2. What was the result? *Dismissed - Denied.*
- D. If your answer is NO, explain why not.
- E. If there is no prisoner grievance procedure in the institution, did you complain to prison authorities? ☐ Yes ☐ No
- F. If your answer is YES,
1. What steps did you take?
 2. What was the result?
- G. If your answer is NO, explain why not.
- H. Attach copies of your request for an administrative remedy and any response you received. If you cannot do so, explain why not:
*When transferred from Pleasant to New River, Maxwell kept all of my Grievance Paper Work, which were in a Manila envelope marked Grievances! It was outrageous!
 March 9, 2016.
 Years of transfer's and shake downs*

IV. STATEMENT OF CLAIM

- A. State here, as briefly as possible, when, where, how, and by whom you feel your constitutional rights were violated. Do not include legal arguments of citations. If you wish to present legal arguments or citations, file a separate memorandum of law. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. If your claims relate to prison disciplinary proceedings, attach copies of the disciplinary charges and any disciplinary hearing summary as exhibits. You should also attach any relevant, supporting documentation.

- #1.) In 1995 while at Robinson C.C. A new tumor reappeared on the top of my left foot. I informed Heathclere, and was told it was only scar tissue! The tumor grew from dime size to quarter size, and I went back to Heathclere and was told I was an hypocodriact and if I came back with same issue I would go to Segregation!
- #2.) In 1995 while in Robinson C.C., while participating power lifting, doing Squats blew my back out and became a paraplegic totally paralyzed from waist down. Heathclere said I was faking and had me put in Seg. for almost two weeks, where I had to crawl across the floor to get meals three times a day, and subject to being poked and stuck by nurses with safety pins needles. He also used latex pins from my toes to my sacrum two to three times a day (which produced no movement!) Finally after two weeks in the middle of the night I was taken to Big Muddy C.C. By Suburban. (But Robinson Heathclere told Big Muddy Heathclere I was a hypocodriact and faking for attention. So Big Muddy refused any medical treatment for the tumor on left foot or my back as per Robinson C.C.) A year later my left foot was partly amputated for bone cancer!!! And Attenwerd Deputy Director Mike Neal forced Big Muddy to allow me to see an Orthopedic Specialist for my back and legs and within a year of treatment as therapy I was up walking on good legs? (Was released in 98 and returned in 2000, and again in 2006.)

IV. Statement of Claim

A.) page 5-B.

#3.) In 2007 November arriving at Meserel C.C. with the same blows out back from 1995, an amputated ^{partial} left foot from 1996, with also a broken tibia from 2001, and a broken heel ball of left Amputee is 2005, and an injury to back in 2006 which "paralyzed" me again all stem from Robinson C.C. injuries! So when I arrived at Meserel C.C. I had a weight displacement brace and a chair back brace, which "Dr. Finverman" took and placed me on the third floor of Healthcare, stating Meserel is not handicap assessable and your classified Maximum Security you'll be up here in a wheelchair for your entire time here! I wrote Wendon Corder for Emergency Medical transfer to a Medical Institute (Big Muddy) Warden Corder wrote that I had to be in Meserel for at least 6 months before I can request a transfer! Next day at 7am Dr. Finverman came in and told me get my stuff, nobody goes over his head he called me a few choice names and told the % to take me to the elevator with the wheelchair, which he did, but told me I had to get out of the wheelchair at the elevator per Dr. Finverman. I was dumped on the floor of the elevator on the floor, and rode down to first floor, where the Sergeant told me if I did not make it to North One Housing Unit before the next live run's or they will send me to Segregation per Dr. Finverman I crawled out onto front street where Lt. Durham had front street and came into Healthcare and demanded a wheelchair for me, and was told by the Sergeant that Dr. Finverman said no wheelchair and if Heywood don't make it to North One before next live take him to Seg. Lt. Durham swept and stepped to outside grounds workers to bring a cart over and put me on the cart and took me over to North One, at

IV.

Statement of Claim

A.) page 5-6.

When the house sergeant Banner told me I would be on 3 gallery (upstairs) the gallery workers took my stuff up but I (Haywood) had to crawl up the stairs on my butt, once I got up to 3. the workers put me on a gallery cart and took me to my cell!

- 4.) In December 2007 I (Haywood) was moved from North One 3 gallery to the West House 1. gallery 2. cell close to the shower, and placed on Permesest Lay-in which lasted from December 2007 to March 2016 almost 9 years! No yard; no chow hall; no gym; "No Chapel"; No wheelchair could not go to head library; No go to commissary; NO Programs! I could only go to Healthcare and back to my cell, and that was the only time I could use a wheelchair. Except in February 2008 right after a blizzard I had a Dr. Cell pass and my gallery % west and got the ATV. Ambulance that was in a cage in front of Healthcare, came and got me from West House to healthcare to see Dr. Finerman at which time Dr. Finerman yelled at me that I never had seen and Dr. Finerman told the % Miller not to use the ambulance to move me around, at that time West House Sergeant was coming down the hall from buying Pop's and heard Dr. Finerman yelling at % Miller and me, and came into the exam room and asked what is going on. Dr. Finerman said % Miller could not use ambulance the Sergeant informed Dr. Finerman he would use the ambulance anytime he wanted! Two weeks later Dr. Finerman had the ambulance closure torn down, and got rid of the ambulance!!!

IV.

Statement of Claim

A.) page 5-D.

5.) In 2011 I (Heywood) was moved to North One 2 gellery which used to be P.L. behind the steel doors with the box as the door, and a few cell's down was the on gellery shower's but had not been used 15 year's. Myself and another inmate elevated out the shower, but the water would not go down the drain, we informed % Steward our gellery officer, who called maintenance who came but without a bucket? In 1982 I accidently cut off my big toe with a Skill saw on my right foot, it was reattached! In 2011 due to the stupidest water in North One showers I got a bad staff infection in that big toe! Had taken several different antibiotics finally Dr. Newberry had to do surgery (cut open the toe and pack it with gauze with antibiotics, and every two days pull it out and repack it (Painful)) But during this time Messard went on a level one lockdown, and for two weeks no one would take me to Healthcare to get dressing change, the %'s change during lockdowns and all of them told me that Healthcare had not called for me and they were not required to call healthcare for me, if they wanted me they would send for me! Until % Laura came back from her vacation and asked how I was doing, and I told her she went and called healthcare, and they took me to healthcare within the hour! Had to start the process over! (Painful)!

6.) In 2012 Major Liorla spoke to me about moving me to South hawens to test putting handicaps over there, shower at end of gellery and a yard off of the gellery!

IV. Statement of Claim

A.) page 5-E.

Upon moving I met the Senior Officer % Maue, who did not want the handcuffs in South towers, so he gave me a hard time about the shower, he refused to allow me to use the shower unless as I have to use the handcuff chair and be seated % Maue told my (you have to have the chair, but you can go with everybody else.) The shower holds 32 men at a time in the water and maybe another 10 waiting, and I was suppose to sit naked between 31 naked men? So I stopped going to the shower, a Lt. asked one night why I was not showering and I told him, to which they started running me by myself again, which upset % Maue!

7.) In 2012 % Predi who was not my gelling officer was as I gelling after using the bathroom. As is my religious (Christian) custom at about 6pm I read my Bible and pray, as my knees at my bar's. When I got up % Predi was standing in front of my bar's and shook his head, and (said I wouldn't do that if I was you!) and walked off. Two days later, as I got up from praying there he was % Predi, and he asked me for my I.D. which I gave him, he left and came back with a Lt. (We were on level one lockdown) who told me to "cuff up" I asked why he said (Disobeying A Direct Order) I asked could I pack my own stuff, (No!) I informed them I needed a wheelchair? % Predi said (you don't use a wheelchair when I took you to commissary) I told him I'm a perment handicapped, I don't go to commissary, and you have never took me anywhere I need a wheelchair. % Predi called and said I was refusing

IK. Statement of Claim
A) page 5 f.

To go to segregation, and Major Brown came, and said what is going on I told him (he's walking me for Prager) and it's him that is refusing me to wheelchair! Yo Predi told Major Brown he don't need to wheelchair! Major Brown told Yo Predi to go to health care and get a wheelchair if he wanted to take me to seg. The Ticket read (I told inmate Haywood he could pray in the gallery, such activities are only allowed at the chapel, and Haywood told me he does what he wants!) (hbs) (Permanent Hays can't go to chapel!)

I saw adjustment committee, who said they were throwing out the ticket and sending me back to South house as soon as room was available! So I was in a Seg Cell for two days and then moved to North Two S gallery Seg-kickout? were I stayed 52 days? But on my 22nd day I got a notification that I had received 3 months L. Care?!

When I inquired to the adjustment committee, I was told that's what the computer did?

- 8.) In 2014 while at Menard C.C. South house's Yo Maue had his chance to get rid of Haywood! Haywood was moved to cell 1 on 1 gallery which is a gallery worker cell right off from the Sergeants cage! My 4th cellie was Brian Doyle a diabetic who also had a Bottom Buck permitt (Im Permanent Hays-I's can't walk Permanent Bottom Buck Low gallery). Doyle didn't want to tell Yo Maue cause didn't want to lose job but instead decided to force me out of the cell!

Statement of Claim

A.) page 5-6.

In May 2014, Doyle started argument before he went to work and left. Haywood packed all of his stuff, to walk himself at shift change, as we were on Quaranstine lockdown from Salmasilla (under locked chikets) and new roof! Doyle saw Haywood's property packed and got % Mrs. K. who was getting Sergeant at that time and day! Doyle told her (Haywood has packed up and is acting very aggressive) % Mrs. K. came around to cell 1. and asked Haywood why he was packed up, Haywood said "I've asked you for weeks to move me, I've got nothing to say!" % Mrs. K. said she would come back later after I had calmed down and left! Right before shift change % Maurice and Doyle came to the cell where Doyle got his shower stuff and told % Maurice that (He's got this?) After worker showers % Maurice, % K. and 3 other %'s plus one other % above my cell on 3 gallery! % Maurice took the cell key's and told % K. (they are both men let them handle it!) % Maurice open the cell and sent Doyle into the cell to fight Haywood, Doyle came in postured to fight, but Haywood fired first, and Doyle ran out of the cell over two %'s, Haywood swung so hard he fell over, headed face first to the floor, when % Maurice stepped into the cell and caught Haywood in a full frontal head lock, and pulled Haywood out of the cell and went MMA wrestling stood Haywood upside down and suplexed him onto the cinder floor and then % Maurice engaged in a full frontal choke hold facing my head on, and % Maurice kept sucking up as an attempt to "break my neck", every time he'd suck up, I'd crawl forward so he couldn't break my neck!!! The guard Lt. came onto 1 gallery knowing nothing of what was going on! And saw me (Haywood) on the floor with four guards

IV. Statement of Elc/m
A.) page 5-H.

on my back and % Maus choking me to death. (The Lt. told % Maus to get off of Heywood, let him go before you kill him!) % Maus finally released the choke and shoved my feet into the floor and put his knee in the back of my neck! (The Lt. told % Maus to get off of him now!) the Lt. told % Beethrow to go and get a wheelchair! At that point I was in and out of consciousness! % Beethrow came back with a wheelchair and the Lt. told the officers to pick me up and get me into the chair and the Lt. called Heathclere to let them know he was bringing me to be checked, while he was on the phone at the front door, % Maus was steadily over me like a rabid dog about to strike, the Lt. pushed him back and positioned himself between % Maus and me (Heywood) and told him to go cool off now! The Lt. took me to Heathclere, but I could not speak due to the choking (couldn't speak for over 4 days), Lt. told Heathclere it was a cell fight, then he took me to segregation 4 gallery which he himself carried me up the stairs! (My property was still in the cell packed, and it was left with Brian Doyle until the next day?) (Supposedly Shift Change?)! Later that night the nurse came to see me, and as best I could, I told her I needed to see a Dr. (Elbow broken and neck injured)!

Within 4 days I got a pass for the Adjustment Committee on the 11th day, and on that day % Chasler % Maus's best friend had 4 gallery seg. (He had work South tower's with % Maus, % Doyle and were known to beat down old med inmates!!!) % Chasler came to my cell and told me he would be to get me before lunch get ready, I told him I need a wheelchair, and he left! Lunch came and went, god it was 2:pm before I saw % Chasler again, and I said (What about my ticket, I'm

IV. Statement of Claim
 A) page 5-1.

% Chasler told me I had refused. I said No I did not
 % Chasler said who you asked for a wheelchair you refused!
 And the committee found me guilty of a Staff Assault for falling
 on a officer, because I had refused to come to the hearing
 and give any exonerating evidence!

Which time of two almost three weeks A % came and
 get me in a wheelchair and took me to healthcare to see the
 Dr. who put me on the 3rd floor seg cell, took X-rays of
 my neck? and my elbow? (Three weeks later?) I was
 told there was nothing wrong with either (But to this day I
 can still move a piece of my elbow, and I got the X-ray report
 which speaks of the fracture!) But I was never treated
 at Mewerd or anywhere else!) I was kept in healthcare
 for over 3 weeks with no treatment? until there was a T.B.
 outbreak (Supposedly there was no room in the headicep seg hallway
 but was moved back to seg. to reg. cell and move every two
 week from 2 gallery to 4 gallery up, down, they would have
 inmate gallery workers carry me up and down the stairs
 several times!) At this time I was under the impression that
 I (Haywood) was in seg. for a cell fight 30 day maximum!
 I saw Warden Buttler walking through and stopped her and
 told her I was over 30 days and they won't let me out
 of seg. and that I had never gotten a decision from the
 adjustment committee, but for a cell fight which I hit nobody
 is generally 30 days. Warden Buttler said Haywood you got
 a staff assault and you got 90 days and four very lucky!
 I (Haywood) said No man I don't have a staff assault
 (Director Cordinez had told Warden Buttler to Transfer Haywood
 to medical institution Big Muddy!) Warden Buttler said I'll

IV. Statement of Claim
 A.) page 5-5.

That she would send me a copy of Committee Report and
 Decisions! And she did (staff assault-telling an officer?)
 (If %Maue had not come into my cell I would have killed on the
 floor! He chose to catch me so he could kill me!) And there
 was a staff assault why was each called, we ht. called, we
 Major called, and it is in healthcare records cell fight!

And the fact that %Deathrow, %K, %Maue who all knew
 there was a problem between callers Heywood and Doyle hours
 earlier never reported it to the guest house ht. that day, and
 further violated procedure and all security protocol so that Heywood
 and Doyle were already separated that cell door was not suppose
 to open without a ht. present! And %Maue threatens to spray
 me with mace! When I got my property list, there was
 over \$200.00 worth of property missing (Seg Walkman and earbud;
 18 tapes; New never worn Rebox Tennis Shoe; and several other
 items) --

9.) In 2014 I was told that Maxwell had power to place me, as
 %Maue and inmate Doyle felt unsafe with me being in South
 tower's, and they could not keep me in Healthcare 3rd floor; nor
 could the house me in Seg. A Wing, as it is segregated!
 So I was shuffled from (South tower to North 2, to North 1, back
 to North 2. now of which is handicap accessible!) between 2014 and
 2016 when finally transferred to Lawrence C.C.!

IV. Statement of Claim
A.) page 5-K

10.) In 2016 while in North #2. the flood came, and afterwards I was so sick, couldn't breathe and weak! I wrote healthcare several times, and told the nurse at med law every night for two weeks! Finally my 5 day-a-week % told me to get dressed, and he went and got a wheelchair and took me to healthcare and he told the Doctor this man is dying as my gallery and I can't watch it! the Dr. had them take me to the 3rd floor, and take X-rays, and I was told I had Pneumonia, and was given antibiotics, after 4 days I got worse, they changed my antibiotics, but it helped none at all! Then I was told that I was being sent back to my house and cell? When I got to my cell my 5 day-a-week % told me to get my property ready the workers would be coming for it and what size jumpsuit I needed, that I was being transferred in the morning to Lawrence! Found out in August 2016 from Cerk Foundation Hospital with Pneumonia by Terminal Pulmonary Severe Sarcoidosis and Congestive Heart Failure!

11.) On March 9, 2016 at 5:am Third Shift % asked me to get ready for transfer, I told him I needed a wheelchair, he told me it said nothing on the board about my needing a wheelchair I told him I'm a permit guy-I can only go to healthcare and to a wheelchair, I need one please! He went and got the Sergeant who said there is nothing, I called healthcare they said there is nothing that says you need a wheelchair! So you either walk

IV.

Statement of Claim

A.) page 5 - L.

or stay here.' So I (Haywood) took off the jumpsuit, and rolled out the mattress and laid down. The Co and Sergeant walked away. After 15-20 mins the Co and Sergeant came back with a Lt. who asked what's the problem, so I explained my situation (Permost was in wheelchair bed, never leave cell but to health care as medical not health care accessible.) the Lt. saw my left is amputated and told the Co just go and get a wheelchair and take him to the chople. The Co went and got a wheelchair, and came and got me and took me to the chople, and when we got there everybody else had already be strip searched, the Lt. at the chople told the Co who brought me he had to search me, so he asked me to sit in a chople seat and hand him my jumpsuit which I did and my shoes, he handed me everything back told me to get dressed, and as I was getting dressed the Co started leaving with the wheelchair? I said what are you doing he said I got to take the chair back to health care. (Note #2 had several wheelchairs as known.) I said how am I suppose to get around there and to the bus? (After a fight to the chople they got the chople off into 4 different sections, which meant I had to go all the way down to the stage and across the length of the chople and then back up the other side to get back to the door to get out to the bus? The chople Lt. came over and said lets go, I said I need the wheelchair (Also I wearing a medical mask.) the Co said I have to take this chair back to health care, the Lt. told the Co to take the chair back, I said what am I suppose to do, the Lt. said get on the bus or stay its up to you! Then the Lt. told a Serg. and another Co watch this! So I got on the floor and crawled down to the stage and over to the other side and I ran out of breath as my way

IV. Statement of Claim
 A. Page 5-M.

back up to the door, and I fell flat on the floor, I could hear the Lt. say you better hurry we're leaving (they were laughing!) I also heard two inmates who were in the bus, we got going old timer, and they picked me up and carried me, even though the Lt. told them not to! Once outside the Lt. told them to put me down or they would go to seg. So I told them to put me down. So I crawled across the pavement and up on the bus, the driver knew me from when he had health care 3rd floor, and he helped me onto the bus! When we got to Lincoln Correction Center the driver sent the other 2 to get a wheelchair for me and for himself and a inmate carried me off the bus to the wheelchair. And the other 2 took me over to Lawrence bus where there was a line outside the bus in the rain (mind you I have a mask on!) there was a Lt. Beyler in the driver seat, who instructed the 2 to load everybody but me? After everybody else was on the bus, Lt. Beyler told me (Nobody is going to help you, so I don't know how you get on this bus crawl or walk!) So I got out of the wheelchair and crawled through the mud and rain and up on onto the bus, Lt. Beyler was laughing! There was an older 2 on the bus who started to try to help but Lt. Beyler said (He can make it) And when we got to Lawrence C.C. they unloaded everybody else first, and then I had to crawl off the bus, but there was a wheelchair right outside the bus, I got into the wheelchair, I was taken by a Sergeant to 3 house no handicap cell, I couldn't breathe I told him I have Nueresia, he said he would call health care he helped me out of the wheelchair and into the cell onto the bed! After 30 min I pushed the emergency

IV. Statement of Claim
 A. Page 5-N.

Several times after about an hour a % came but I couldn't speak cause I couldn't breathe, he left and came back about 20-30 mins with a nurse and a wheelchair and took me to health care where she immediately gave me a breathing treatment. I heard he say he was supposed to have been brought here he's got to go to the back until he sees the Doctor!

But I was put into a Seg. cell where there was a bench with a mattress on it. It was a large room the sink on one side and the toilet on the opposite corner, and the nurse and health care % helped me onto the bench, and she took the chair. I said I need the wheelchair to get around, the nurse told me (our Dr. don't just give out wheelchairs, he don't tell for you guys' tricks!) and they left. In the morning another nurse came with medication, but only to the chuck, I said I can't walk, she said are you refusing! So I crawled across the room to the door and got my medication, and then crawled across the room to the sink to get water. And then back to the bench and a hour later came back but only to the chuck. The % called somebody to (watch this!) So I crawled over and got my tray! had set on the floor & eat! So I pulled the mattress off of the bench to the floor and just stayed on the floor! In the morning I was told that the Dr. Lee was on vacation, and that I could not have "the mattress" on the floor, I said well I need a wheelchair, (the nurse told me, we don't tell for all of that) So I stayed on the floor! So for a week a little over I crawled around like his animal to get my meals and use facilities, (No Shower; no clothes, some mud covered jumpsuit, No Soap) they only came to the cell for breathing treatments twice a day never cleaned the cell!

IV. Statement of Claim
A.) page 5-0.

- 12.) In 2016 after leaving Healthcare and waiting to see a Pulmonary Specialist, I was in 5 house as it was the closest to healthcare because I needed an emergency breathing treatment. Dr. Lee had issued me permits (how Buck, how Callen, two mattress, elec cell emergency, wheelchair,) In July my Mother passed away and that same month my wing % checked to % Tubbs, who started with my Lee permit, and told me he would not give me Lee, which I didn't understand because, I came back from law library the day before with other inmates who all asked him for Lee and he gave us all Lee? After that % Tubbs stopped me and my kkk attendant from cleaning my cell with the cleaning Supply's he asked for my permit and said it didn't say cleaning Supply's. So I had Dr. Lee charge it to with cleaning Supply's then % Tubbs said it didn't say bleach or Pink Soap, and then % Tubbs came to my cell one day and asked to see my permits I gave it to him and he wrote on my permit (Lee and elec as of Date Per % Tubbs w/ healthcare.) I started writing grievances, I wrote 25 to % Tubbs, who later stopped me and my kkk attendant from cleaning the shower chair. Said he would do it, that he had worked as an ambulance and knew more about what I need or don't need than I do. For fear of % Tubbs my kkk attendant quit as Tubbs started shaking him down and his cat supply's disappeared!!! I wrote and told everybody Lt. Counselor, Major, Warden my 3rd Cell and % Tubbs tried to hex me & Pinelly Warden Goings came to see me and told me not to write another grievance.

IV

Statement of Elder

A.) page 5-P.

against % Tubbs he was made aware of the problem after the first grievance (but it took 4 months for Werder's Group to respond #2 Werder of Security). The Werder told me, you don't have a Tubbs problem, you have a Permitt Problem, to many permits and they should not be "Indefinite" -- Werder's Group then called Mrs. Cunningham (Healthcare Administrator) and told her he wanted my Medical Permits taken off. He told to make me an appointment with the Doctor R.S.H.P. this week. Werder's Group's hung up and looked at me and smiled and said "See all takes care of." I went back to my cell, in two days I got a pass to see Dr. Sher, I went and Dr. Sher told me I was there to fix what the Administration wanted fixed, I (Hegwood) said what is that, Dr. Sher said all of these permits and to make you permanent party Healthcare you will live in the back. I asked Dr. Sher to look at my permits and the Dr.'s Signature, is it not of your boss the Deputy Medical Director of Illinois Department of Corrections, so please let me know if he feels I need the permits and don't need to be in the back, but you do, who is wrong, who is incompetent? Dr. Sher called the healthcare % Schaefer and told him to remove me that I was done. That night I wrote a grievance against Werder's Group (is that I feared for my life) No more was said about my permits.

But % Tubbs would not stop the harassment, it got worst he would totally refused any of my permits, and would shake down my cell and throw away my commissary I bought telling me it was in the wrong place or in the wrong package.

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So I said to the Counselor, (I'm tired I just lost my Mother and within a month of that he used out his Terminal Ill. and I've got him, and now Tubbs, and nobody will deal with him, what happens when I get to the point of I'm dying who can I take with me?) The next day I was moved to a house where I remain to this day! Tubbs was med. & Lt. exalted for some reason given the 2011 I live in which covers 4 house, but recently he was wearing Sergeant's Uniform? But no more problems with him!

13. In 2017 February after my writing personal property over the last almost year (March 2016) how come my EL-20 headphones never went out to Ross to be fixed in February they finally took \$9.00 for repair and \$3.75 for postage! April 2017 I wrote personal property, no answer, so I spoke to my Counselor Mrs. Bear who said she would check on them. I showed her my account balance where the money had already been taken! So in May 2017 Mrs. Bear told me property does it have my EL-20's they never came back yet! So I wrote Ross myself, who responded in June 2017, that they had never received the headphones or payment, to have the institution put a tracker on them! I gave Mrs. Bear a copy of

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of the Koss letter and she told me to write a grievance so I did which she (Mrs. Beer) heard? and responded would I accept a replacement pair, and they were reimbursing me the \$900 the check was for (that means they never left Lawrence C.C.!) and that they could if prove my CL-20's were under 5 year's old (they minus 20% per year depreciation?) I responded (yes I'll take a replacement) and I told her I could prove my CL-20's were under a year when I got here (nobody knows who broke the arm?) But I've never touched them since I've been here at Lawrence. on March 27, 2016 personnel properly told me my CL-20's arm was broken which is the same as altered, and I could either send them home or destroy them, or send them out to be fixed at Koss, I choose to fix them! So in December 2017 a % came to my door, and told me to come out of my cell, he was there to shake my cell as per the administration for CL-20's headphones, which he did (why?) (I'm in a wheelchair, you think nobody saw me go out of my cell without a key, leave the building and go to Voc Ed building into property and behind the gate and get my CL-20's?) A week later I got a statement from the grievance officer that they were going to reimburse the \$375 for postage, but would give me nothing for my CL-20's!

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- 14.) On November 24, 2015 I went to healthcare, and when I get there I found I was to see Dr. Shew? He's not my Doctor Dr. Arnold is? Dr. Shew proceeded to take away my High Blood Pressure Medications that Dr. Arnold (Medical Director) had just given me and used my Heart medications? So I told him it took over a month for me to get one of my medications and I'm out of my "hesix" now (I take close to 30 pills per day I said the wrong one, I should have said "Potassium"). - Dr. Shew called his Nurse Collins and asked her to find out why I don't have my "hesix", Nurse Collins came back with a Sergeant and a % and called me in when and said she was having my cell sheet done, Dr. Shew never addressed her, so neither did I. And then the Serg. put me in a Seg. cell, until they shoot my cell, then they came back with all of my medications in blister packs which I'm suppose to have? What I didn't know is that Nurse Collins told the Lt. Buttrick that I told her I had no Medications (I never spoke to her, and she was not present when I spoke to Dr. Shew?). - Nurse Collins told Lt. Buttrick to take me to Seg. which he said no and asked her which cell he have and Nurse Collins said none of them I'm keeping these he can have the antibiotics, Lt. Buttrick took my back to my unit and told me what Nurse Collins had said! (So we never get to I was out of Potassium!!!)

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That evening when med line was run, I went out to see the Nurse who gave me my medications along with the higher dose of "Corey" Heart medications and we High Blood Pressure or Potassium, I told the nurse I had taken the Corey earlier this morning maybe I shouldn't take it now, but she said Dr. Sher up the dosage after that, you need to take it!

I was peeing every 30 mins all night, by 8 am I fell out (Dehydrated) my cellie called for help, the guard to come and hlt. (I was out of it, but I could hear, but I couldn't speak.) So I heard my cellie tell them that (yesterday healthcare took all of his meals, but he went to med line this morning at 5 am, but I don't know if he took anything!) ---

I got to healthcare and Nurse Tammy Dewy said off the bat He overdosed (His cellie said he had a bunch of pills and took a head full this morning!) Nurse Tammy called J. A. (Interse) Gillies and told them I (Haywood) had overdosed, and what she claims my cellie had said to her! Then they sent Lt. Buttrick to shake down my cell (his perches lie) who came back with the Pemulen and Mobic and Bactrim and cold pills and Corean all over mist and I'm suppose to have (What I didn't know is that Pemulen is a "Psychotropic" Without out my permission!) ---

So I was on a gurney on a back board strapped down, and telling (I need water Dehydrated) over and over, but Nurse Tammy would allow nobody to give me water until I tell her what pills I took, so I lay there unable to swallow literally dying cause I'm so dehydrate and without Potassium or Salt!! I'm in the Treage room for over two hours until they finally decided to put me in the back for 23 hour observation! (Could it be with a overdose I should have been dead by then?)

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When I got to the back I got the porters to get me water, and I drank alot mybr & glasses is 10 mlw, which meant I had to pee, I asked for help and I was out for the count as the floor I had to at hit my head cause when I did state to come too I had to throw up. (Nausea) They called for a ambulance it came and there was Nurse Tammy punching me in my chest with her knuckle (It hurt so bad) and I could hear her talking the EMT's I had overdosed to the point the EMT said yeh he's jacked up off of something. They strapped me to a flat board again put me in the ambulance with two ladies as because they were told I was an overdose they didn't wait to get an I.V. going. She took off, over bumps and bumpy road rail road tracks, all the while trying to get an I.V. started cutting me with needles, and jabbing in and out several times with no success, but well marked up my left arm with life time marks. And I'm pretty sure she stuck herself cause she then asked if I had kids or HIV or Hepatitis I said no but I don't know her history. (I need to) Everybody kept asking what I took, I kept saying I dehydrated but because Nurse Tammy told them I was an overdose they ignored me and treated like I was, trying to protect myself so I was treated with contempt!!! I've got a blow out back and two broken knee caps, so being strapped down on the flat board was causing me the worst pain ever! I was begging them to release the straps but (I'm considered suicidal) they refused and kept me like that for four hours until the blood test came back which showed NO drugs in my system and dangerously low potassium and salt levels (It death's door!) then I was asked by the Dr. why

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I had not told nobody! They fed me and gave me
 Two 1/2 bags of fluids, and everything to drink and 40 mg.
 of Potassium! After 8 hours I was back at Lawrence C.C.
 under observation, the next day I went back to my cell
 at which I got a major ticket for the pills, and that
 is when I found out that Pamalon was a Psychotropic
 drug! Had received 3 months C-grade, 3 months B-grade
 6 months of no contact with my family when I'm terminally ill?
 No recreation, no commissary!

Had to this day I've still not gotten my High Blood Pressure medication
 but on 12-29-17 I almost had a stroke as blood pressure is
 thru the roof!

V. REQUEST FOR RELIEF

State exactly what you want this court to do for you. If you are a state or federal prisoner and seek relief which affects the fact or duration of your imprisonment (for example: illegal detention, restoration of good time, expungement of records, or parole), you must file your claim on a habeas corpus form, pursuant to 28 U.S.C. §§ 2241, 2254, or 2255. Copies of these forms are available from the clerk's office.

Actual Damages and Punitive Damages
 No Attorney Requested to handle as it is complicated
 in lay person with limited legal library access

VI. JURY DEMAND (check one box below)

The plaintiff ☒ does ☐ does not request a trial by jury.

DECLARATION UNDER FEDERAL RULE OF CIVIL PROCEDURE 11

I certify to the best of my knowledge, information, and belief, that this complaint is in full compliance with Rule 11(a) and 11(b) of the Federal Rules of Civil Procedure. The undersigned also recognizes that failure to comply with Rule 11 may result in sanctions.

Signed on: 12-29-17
 (date)

Stephen D. Heywood
 Signature of Plaintiff

10930 Heywood Rd.
 Street Address

Stephen D. Heywood
 Printed Name

Sumner, IL 62466
 City, State, Zip

B44615
 Prisoner Register Number

 Signature of Attorney (if any)

THIS CORRESPONDENCE
IS FROM AN INMATE OF THE
IL DEPT OF CORRECTIONS



B44615
John D. Hewwood
10930 hawwood Rd.
Sumner, Ill. 62466



10:
The Central District Federal Court
Federal Court Building
Springfield, Ill. 62701.

(Legal Mail)